

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)
KPM ANALYTICS NORTH AMERICA)
CORPORATION,)
Plaintiff,) Civil Action No. 4:21-cv-10572-
v.) TSH
)
BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE)
TECHNOLOGIES GROUP & CO., LTD; ARNOLD)
EILERT; MICHELLE GAJEWSKI; ROBERT)
GAJEWSKI; RACHAEL GLENISTER; GREGORY)
ISRAELSON; IRVIN LUCAS; and PHILIP)
OSSOWSKI,)
Defendants.)
)

AFFIDAVIT OF ROBERT WILT IN SUPPORT OF DEFENDANT THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD'S MOTION FOR SUMMARY JUDGMENT
AND REQUEST FOR HEARING

1. I, Robert Wilt, certify that I have personal knowledge of the facts set forth herein. I am over the age of eighteen, I currently reside at 22189 Bay Shore Rd., Chestertown, MD 21620, and am fully competent to testify to the facts in this declaration.
2. I am co-founder and sole owner of Defendant The Innovative Technologies Group & Co ("ITGC"), a Maryland Corporation, whose address is 8017 Dorsey Run Rd., Jessup MD 20794.
3. I understand that the Plaintiff in this case, KPM Analytics North America Corporation ("KPM"), has made allegations that some Blue Sun employees who were former employees of KPM improperly used KPM "customer lists" and other related KPM customer information in connection with their work for Blue Sun. I have never seen, reviewed or accessed KPM customer lists. ITG does not utilize any KPM trade secrets in its design and manufacture of its

NIR Analyzer machines. ITG does not perform any servicing or maintenance on KPM Spectrastar NIR Analyzer machines.

4. I have no personal knowledge as to whether any Blue Sun employee has or had in the past possession of any KPM trade secret while working for Blue Sun.

[REDACTED]

I declare, under penalty of perjury of the United States of America that the foregoing is true and correct based on my personal knowledge.

By:



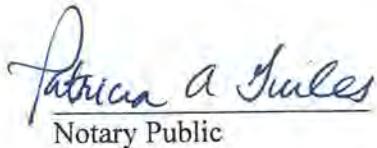
Robert Wilt

8/18/22

Date

STATE OF MARYLAND)
)
COUNTY OF ANNE ARUNDEL)

On this 8 day of August 2022, before me personally came Robert Wilt, known to me to be the individual described in and who executed the foregoing affidavit, and duly acknowledged to me that he executed the same and is the person described in the above affidavit; and that he signed his name hereto.


Patricia A. Guiles
Notary Public



[SEAL]